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Ms. Jean A. Webb
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

August 4, 2004

RE: Exchange Certification of Amendments to Chapter 8-A Mutual Offset System
CME Submission #04-77

Dear Ms. Webb:

Chicago Mercantile Exchange Inc. ("CME" or "the Exchange") hereby notifies the Commission of amendments to Chapter 8-A, Mutual Offset System.

The Exchange certifies that these actions neither violate nor are inconsistent with any portion of the Commodity Exchange Act or of the rules thereunder.

A clarification to Chapter 8-A, rule 871, Contract Eligibility is needed as the yen denominated Nikkei 225 contract is included in the Mutual Offset System but not listed as such in the CME rules.

Please note that on September 3, 2003, the Board approved enhancements to the Nikkei 225 Stock Average contract which included the addition of a yen denominated version. Included was a provision to incorporate the yen denominated Nikkei 225 contract into our Mutual Offset System arrangement with SGX. The Exchange had previously informed the Commission of its intentions to add these enhancements on January 23, 2004 (CME Submission # 04-02).

Clarifications on Rule number 871 follow below. Additions are underlined and deletions are bracketed and struck out.

We hereby agree that these changes shall not be implemented earlier than the business day following the Commission's receipt of this filing. If you require any additional information regarding this action, please do not hesitate to contact Ms. Ariel Hantin, Senior Research Analyst at 312-559-4951 or via e-mail at ahantin@cme.com. Please reference our CME Submission #04-77 on all future correspondence regarding this notification.

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Sincerely,

A handwritten signature in black ink, appearing to read "John W. Labuszewski", with a stylized, sweeping flourish extending from the end.

John W. Labuszewski, Director
Research & Product Development

cc: Mr. Thomas M. Leahy and Mr. Steven B. Benton
CFTC Division of Market Oversight, Product Review & Analysis Section

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871. CONTRACT ELIGIBILITY

The Mutual Offset System may be utilized for the following futures contracts: Three-Month Eurodollar, Three-Month Euroyen, Three-Month Euroyen LIBOR, yen denominated Nikkei 225, and Japanese Government Bonds.